Extraterritorial Taxation.—Robinson *v.* Norfolk, II Va. Appeals 25, decides that § 1032 of the Code, authorizing a city to levy upon a circus exhibiting beyond its territorial limits a license tax for the sole purpose of raising revenue to defray the general expenses of such city, is unlawful. The court—Harrison, J., delivering the opinion—draws a clear-cut distinction between the police power and power of taxation.

Mistake of Law.—In the case of Burton *v.* Haden, II Va. Appeals 52—March 12th, 1908—our Supreme Court draws the distinction between a mistake of general law and a mistake when the "Jus" is a private right. Here a grantor conveyed an entire interest in land under a mistaken impression that her interest was only one third, which mistake was shared in by the grantee. Upon a bill filed to correct and annul this conveyance, the court says in affirming the decision of the lower court setting the deed aside, "The general doctrine embodied in the maxim 'Ignorantia juris non excusat,' is confined to mistakes of the general rules of law and has no application to the mistakes of persons as to their own private legal rights and interests."

Removal of Fixtures on Sale of Property.—In Brunswick Construction Co. *v.* Burden, 101 New York Supplement 716, defendant sold his dwelling house to plaintiff on condition that he might "remove all fixtures attached to said premises." He subsequently carried away mantels and hinges, made to match the furniture, and parquet flooring laid over a permanent floor. In an action brought for damages to the freehold, the New York Supreme Court held that they were not distinctively realty, and refused to grant any relief. And this would seem also to be the rule in Virginia, from the dictum of Judge Christian in Green *v.* Phillips, 26 Gratt. 752, 21 Am. Rep. 323, in which he said: "Mirrors, wardrobes, and other heavy articles of furniture, though fastened to the walls by screws with considerable firmness, must be regarded as chattels."

Conversation over Telephone.—The admissibility in evidence of a telephone conversation was considered in Holzhauer *v.* Sheeny, 104 Southwestern Reporter 1034. The attorney for plaintiff, having ascertained defendant's number from the telephone directory, called up and conversed with her. It was not shown that he knew her voice or that he asked her name. The Kentucky Court of Appeals held that the subject of the conversation and the circumstances of defendant's answering at the number of her address were sufficient identification to charge her as being the person with whom the conversation was had.

In an article in 13 Va. Law Reg. 668, the danger of admitting in